

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RECEIVED
JUDGE: [illegible]
3/1/04
[Signature]
DEPUTY CLERK

CAROLYN GREENE, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH, and RONALD F. RICHARDS,

Defendants.

1:03-cv-12628 (NG)

RELATED ACTIONS:

1:04-cv-10046 (NG)

1:04-cv-10055 (NG)

1:04-cv-10065 (NG)

1:04-cv-10077 (NG)

1:04-cv-10078 (NG)

1:04-cv-10090 (NG)

1:04-cv-10144 (NG)

1:04-cv-10155 (NG)

1:04-cv-10179 (NG)

1:04-cv-10189 (NG)

1:04-cv-10190 (NG)

1:04-cv-10202 (NG)

JOHN G. ESPOSITO, JR., Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH, and RONALD F. RICHARDS,

Defendants.

1:04-cv-10013 (NG)

JOSEPH L. KING, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH, and RONALD F. RICHARDS,

Defendants.

1:04-cv-10038 (NG)

**DECLARATION OF PETER E. SEIDMAN IN SUPPORT OF THE MOTION OF THE
HOMER GROUP FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF,
AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL
AND LIAISON COUNSEL**

I, Peter E. Seidman, under penalties of perjury, hereby declares:

1. I am a partner of the law firm of Milberg Weiss Bershad Hynes & Lerach LLP (“Milberg Weiss”). I submit this declaration in support of the motion of the Homeyer Group for Consolidation, Appointment As Lead Plaintiff, And Approval Of Lead Plaintiff’s Selection Of Co-Lead Counsel and Liaison Counsel.

2. Attached hereto as Exhibit A is a true and correct copy of the first published PSLRA notice by plaintiff in the action *Greene v. Biopure Corporation., et al.*, No. 1:03-cv-12628 (D. Mass. filed on Dec. 30, 2003), caused notice to be published on the *PR Newswire* on December 30, 2003.

3. Attached hereto as Exhibit B are true and accurate copies of the certifications of William E. Homeyer, Jr., William Kim, Gernot Buerger, Thomas Echlin, and Richard M. Acuna (collectively, the “Homeyer Group”).

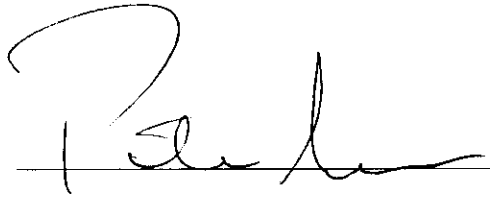
4. Attached hereto as Exhibit C is a chart analyzing Homeyer Group’s financial interest in this action.

5. Attached hereto as Exhibit D is the firm resume of Milberg Weiss.

6. Attached hereto as Exhibit E is the firm resume of Rabin, Murray & Frank LLP.

7. Attached hereto as Exhibit F is the firm resume of Moulton & Gans, P.C.

Dated: March 1, 2004
New York, New York

A handwritten signature in black ink, appearing to read 'P. Seidman', written over a horizontal line.

Peter E. Seidman

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was
served upon the attorney of record for each party
by mail (by hand) on 3/1/04

Nancy Freeman Wang
(auth)

ORIGINAL

CERTIFICATE OF SERVICE

I, Sharon M. Lee, hereby certify that I caused a true and correct copy of the following to be served by regular U.S. Mail to all parties listed on the attached service list on this 1st day of March 2004.

1. MOTION OF THE HOMEYER GROUP FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL;
2. MEMORANDUM OF LAW IN SUPPORT OF THE MOTION OF THE HOMEYER GROUP FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL;
3. DECLARATION OF PETER E. SEIDMAN IN SUPPORT OF THE MOTION OF HOMEYER GROUP FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL;
4. [PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD PLAINTIFF, AND APPROVING SELECTION OF CO-LEAD COUNSEL AND LIAISON COUNSEL; and
5. RULE 7.1(A) CERTIFICATE.



Sharon M. Lee

Service List

Plaintiffs' Counsel:

David Pastor
Peter A. Lagorio
Gilman and Pastor, LLP
Suite 500
Stonehill Corporate Center
999 Broadway
Saugus, MA 01906

Jules Brody
Stull, Stull & Brody
6 East 45th Street
New York, NY 10017

Jeffrey C. Block
Patrick T. Egan
Berman DeValerio Pease
Tabacco Burt & Pucillo
One Liberty Square
8th Floor
Boston, MA 02109
Susan E. Strenger
Perkins Smith & Cohen, LLP
One Beacon Street, 30th Floor
Boston, MA 02108

Deborah R. Gross
Law Offices of Bernard M. Gross, PC
1515 Locust Street
2nd Floor
Philadelphia, PA 19102

Robert P. Fruitkin
Law Offices of Bernard M. Gross, PC
1515 Locust Street
2nd Floor
Philadelphia, PA 19102

Scott E. Poynter
Emerson Poynter LLP
Investor Relations Department
1509 Louisiana, Suites C & D
Little Rock, AR 72202-5094

Samuel H. Rudman
David A. Rosenfeld
Cauley Geller Bowman & Rudman, LLP
200 Broadhollow Road, Suite 406
Melville, NY 11747

Shaye J. Fuchs
Zwerling, Schachter & Zwerling, LLP
615 Merrick Avenue
Westbury, NY 11590-6622

Robert Roseman
Spector, Roseman & Kodroff, P.C.
1818 Market Street
Suite 2500
Philadelphia, PA 19103

Christopher Keller
Goodkind Labaton Rudoff & Sucharow LLP
100 Park Avenue
12th Floor
New York, NY 10017

Seth Ottensoser
Bernstein Liebhard & Lifshitz, LLP
10 East 40th Street
New York, NY 10016

Andrew G. Tolan
Pomerantz Haudek Block Grossman &
Gross LLP
100 Park Avenue
26th Floor
New York, NY 10017

Steven J. Toll
Robert Smits
Cohen, Milstein, Hausfeld & Toll, P.L.L.C.
1100 New York Avenue, N.W.
West Tower – Suite 500
Washington, D.C. 20005

Pamela E. Kulsrud
Kirby McInerney & Squire, LLP
830 Third Avenue
New York, NY 10022

Leigh R. Lasky
Lasky & Rifkind, Ltd.
100 Park Avenue
12th Floor
New York, NY 10017

Marc A. Topaz
Stuart L. Berman
Schriffrin & Barroway, LLP
Three Bala Plaza East
Suite 400
Bala Cynwyd, PA 19004

Jack Fruchter
Fruchter & Twersky LLP
One Pennsylvania Plaza
Suite 1910
New York, NY 10119

Defendants' Counsel

Eunice E. Lee
Robert A. Buhlman
Bingham McCutchen LLP
150 Federal Street
Boston, MA 02110